

Richmond Circuit Court

Case No.: CL20006503-00

TAYLOR, LEKYNA

Vs

GREENWOOD MOTOR LINES INC

TABLE OF CONTENTS

Document Index	Date Filed	Page
COMPLAINT	12/23/2020	1 - 9
OTHER - SK/FE	12/22/2021	10 - 12
MOTION - P NONSUIT DOE/R&L TRANSFER	12/22/2021	13 - 15
CORRESPONDENCE		16 - 16
RECEIPT 12/23/2020 2:55:03 PM.pdf		17 - 17
ACCEPTANCE - COMPLAINT (ACCEPTANCE) - IN PERSON/NOTIFIED IN COURT - HALL, DAVID	12/17/2021	18 - 19

EXHIBIT**1**

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

LEKYNA TAYLOR,

Plaintiff,

v.

GREENWOOD MOTOR LINES, INC.

d/b/a R & L CARRIERS, INC.,

PAUL ALAN VAN DER WERKEN,

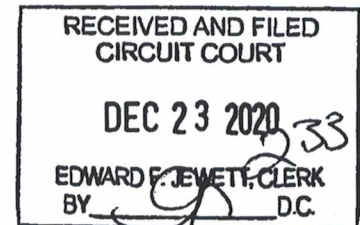
JOHN DOE, an unidentified driver,

R&L TRANSFER, LLC, and

R&L TRANSFER, INC.

Defendants.

Case No.: 20-6503-4



COMPLAINT

NOW COMES the Plaintiff, Lekyna Taylor, by counsel, and respectfully moves this Honorable Court for judgment against the Defendants Greenwood Motor Lines, Inc. d/b/a R & L Carriers, Inc., R&L Transfer, LLC, R&L Transfer, Inc., and Paul Alan Van Der Werken and/or John Doe, an unidentified driver, jointly and severally, in the sum of Five Hundred Thousand Dollars (\$500,000.00) in compensatory damages, together with the cost of this action, and pre-judgment interest from December 28, 2018, on the grounds set forth below:

PARTIES

1. Plaintiff Lekyna Taylor ("Plaintiff") is an adult and for all times relevant to this matter, a domiciliary of Alabama.

2. Defendant Greenwood Motor Lines, Inc. d/b/a R & L Carriers, Inc. (“Greenwood Motor Lines”) is a foreign corporation with its principal place of business in Wilmington, Ohio and is engaged in the shipping and hauling of freight.

3. Defendant Paul Alan Van Der Werken (“Van Der Werken”) was the driver of the tractor-trailer involved in the subject Crash.

4. In the alternative, Defendant John Doe was the driver of the tractor-trailer involved in the subject Crash.

5. Upon information and belief, Defendant Van Der Werken is a domiciliary of Tennessee and resides in Wilson County, Tennessee.

6. Defendant R&L Transfer, LLC is a foreign corporation with its principal place of business in Alexandria, Indiana and is engaged in the shipping and hauling of freight.

7. Defendant R&L Transfer, Inc. is a foreign corporation with its principal place of business in Wilmington, Ohio and is engaged in the shipping and hauling of freight.

8. At all times relevant hereto, Werken and/or John Doe was an employee of Defendants Greenwood Motor Lines, R&L Transfer, LLC, and/or R&L Transfer, Inc. acting within the scope of his employment.

FACTUAL ALLEGATIONS

9. On or about December 28, 2018, Plaintiff was the driver of a 2019 Nissan Sonata and was traveling southbound on Interstate-81 in Rockbridge County, Virginia.

10. At the same time and place, while acting within the scope of his employment/ agency with Defendants Greenwood Motor Lines, R&L Transfer, LLC, and/or R&L Transfer, Inc., Defendant Van Der Werken was driving a tractor-trailer, owned by Defendants Greenwood Motor

Lines, R&L Transfer, LLC, and/or R&L Transfer, Inc. southbound on Interstate-81 in Rockbridge County, Virginia.

11. In the alternative, at the same time and place, while acting within the scope of his employment/agency with Defendants Greenwood Motor Lines, R&L Transfer, LLC, and/or R&L Transfer, Inc., Defendant John Doe, an unidentified motorist, was driving a tractor-trailer, owned by Defendants Greenwood Motor Lines, R&L Transfer, LLC, and/or R&L Transfer, Inc. southbound on Interstate-81 in Rockbridge County, Virginia.

12. Defendant Van Der Werken unlawfully failed to yield the right of way when he allowed the tractor-trailer he was operating to enter the lane occupied by Plaintiff Lekyna Taylor's vehicle. In doing so, Defendant Van Der Werken struck the passenger side of that vehicle, causing it to become attached to the trailer he was operating.

13. In the alternative, Defendant John Doe unlawfully failed to yield the right of way when he allowed the tractor-trailer he was operating to enter the lane occupied by Plaintiff Lekyna Taylor's vehicle. In doing so, Defendant John Doe struck the passenger side of that vehicle, causing it to become attached to the trailer he was operating.

14. The impact between the tractor-trailer and the Plaintiff's vehicle caused the Plaintiff's vehicle to strike the guard rail, rotate across the highway and then strike the jersey wall twice.

15. Paragraphs 10 and 11 shall be collectively referred to hereinafter as "the Crash."

16. As a result of the Crash, Plaintiff suffered multiple, serious injuries.

CAUSES OF ACTION
COUNT 1
NEGLIGENCE
(All Defendants)

17. The Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation asserted in the preceding and following paragraphs, including each and every factual and legal allegation hereinbefore and hereinafter alleged, and hereby re-adopts and re-alleges each such allegation.

18. Van Der Werken and/or John Doe was negligent for failing to keep a proper lookout while operating his tractor-trailer, for failing to keep his tractor-trailer under proper control, for causing his tractor-trailer to crash into the vehicle occupied by Plaintiff, which proximately caused, for failing to comply with the state laws and/or ordinances applicable to individuals operating motor vehicles in the Commonwealth of Virginia, and for otherwise being negligent in the operation of his tractor-trailer.

19. Van Der Werken's and/or John Doe's actions constitute negligence, negligence per se, gross negligence, and/or willful and wanton negligence.

20. Defendants Greenwood Motor Lines, R&L Transfer, LLC, and R&L Transfer, Inc. are liable for the negligence, negligence per se, gross negligence, and/or willful and wanton negligence of Van Der Werken and/or John Doe.

21. The negligence, negligence per se, gross negligence, and/or willful and wanton negligence of Van Der Werken and/or John Doe, and Defendants Greenwood Motor Lines, R&L Transfer, LLC, and R&L Transfer, Inc.. was a proximate cause of the Crash and Plaintiff's damages.

DAMAGES

22. The Plaintiff hereby incorporated by reference, as if fully set forth herein, each and every allegation asserted in the preceding and following paragraphs, including each and every factual and legal allegation hereinbefore and hereinafter alleged, and hereby re-adopts and re-alleges each such allegation.

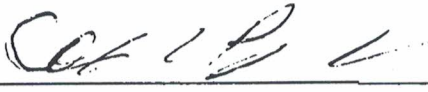
23. As a direct and proximate result of the Defendants' negligence, negligence *per se*, gross negligence, and/or willful and wanton negligence, the Plaintiff suffered damages in the following particulars:

- a. Bodily injuries both permanent and nonpermanent in nature which have affected the Plaintiff's health;
- b. Past, present and future physical pain;
- c. Past, present, and future mental anguish;
- d. Past, present and future inconvenience;
- e. Past, present, and future deformity and disfigurement and related embarrassment;
- f. Past, present and future medical expenses;
- g. Past, present and future lost earnings and a lessening of earning capacity; and
- h. Other out-of-pocket expenses and damages resulting from this occurrence.

WHEREFORE, the Plaintiff demands judgment against Defendants Greenwood Motor Lines, Inc. d/b/a R & L Carriers, Inc., R&L Transfer, LLC, and R&L Transfer, Inc., and Paul Alan Van Der Werken and/or John Doe, jointly and severally, in the sum of Five Hundred Thousand Dollars (\$500,000.00) in compensatory damages, together with the cost of this action, and pre-judgment interest from December 28, 2018.

A TRIAL BY JURY IS HEREBY DEMANDED

LEKYNA TAYLOR

By: 
Of Counsel

Connor Bleakley, Esq. (VSB #92113)
Commonwealth Law Group, LLC
3311 West Broad Street
Richmond, VA 23230
Phone: (804) 201-4969
Facsimile: (804) 201-4969
cbleakley@hurtingva.com
Counsel for Plaintiff

COVER SHEET FOR FILING CIVIL ACTIONS

COMMONWEALTH OF VIRGINIA

Case No.

(CLERK'S OFFICE USE ONLY)

Richmond City

Circuit Court

Lekyna Taylor
PLAINTIFF(S)v./In re: Greenwood Motor Lines, Inc., Paul Alan Van Der Werken
DEFENDANT(S)

John Doe, R&L Transfer, LLC, R&L Transfer, Inc.

I, the undersigned ☐ plaintiff ☐ defendant ☒ attorney for ☒ plaintiff ☐ defendant hereby notify the Clerk of Court that I am filing the following civil action. (Please indicate by checking box that most closely identifies the claim being asserted or relief sought.)

GENERAL CIVIL**Subsequent Actions**

- ☐ Claim Impleading Third Party Defendant
☐ Monetary Damages
☐ No Monetary Damages
☐ Counterclaim
☐ Monetary Damages
☐ No Monetary Damages
☐ Cross Claim
☐ Interpleader
☐ Reinstatement (other than divorce or driving privileges)
☐ Removal of Case to Federal Court

Business & Contract

- ☐ Attachment
☐ Confessed Judgment
☐ Contract Action
☐ Contract Specific Performance
☐ Detinue
☐ Garnishment

Property

- ☐ Annexation
☐ Condemnation
☐ Ejectment
☐ Encumber/Sell Real Estate
☐ Enforce Vendor's Lien
☐ Escheatment
☐ Establish Boundaries
☐ Landlord/Tenant
☐ Unlawful Detainer
☐ Mechanics Lien
☐ Partition
☐ Quiet Title
☐ Termination of Mineral Rights

Tort

- ☐ Asbestos Litigation
☐ Compromise Settlement
☐ Intentional Tort
☐ Medical Malpractice
☒ Motor Vehicle Tort
☐ Product Liability
☐ Wrongful Death
☐ Other General Tort Liability

ADMINISTRATIVE LAW

- ☐ Appeal/Judicial Review of Decision of (select one)
☐ ABC Board
☐ Board of Zoning
☐ Compensation Board
☐ DMV License Suspension
☐ Employee Grievance Decision
☐ Employment Commission
☐ Local Government
☐ Marine Resources Commission
☐ School Board
☐ Voter Registration
☐ Other Administrative Appeal

DOMESTIC/FAMILY

- ☐ Adoption
☐ Adoption -- Foreign
☐ Adult Protection
☐ Annulment
☐ Annulment -- Counterclaim/Responsive Pleading
☐ Child Abuse and Neglect -- Unfounded Complaint
☐ Civil Contempt
☐ Divorce (select one)
☐ Complaint -- Contested*
☐ Complaint -- Uncontested*
☐ Counterclaim/Responsive Pleading
☐ Reinstatement -- Custody/Visitation/Support/Equitable Distribution
☐ Separate Maintenance
☐ Separate Maintenance Counterclaim

WRITS

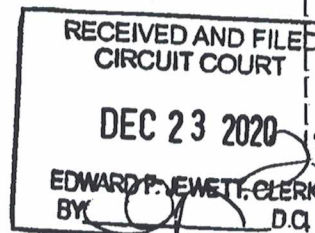
- ☐ Certiorari
☐ Habeas Corpus
☐ Mandamus
☐ Prohibition
☐ Quo Warranto

PROBATE/WILLS AND TRUSTS

- ☐ Accounting
☐ Aid and Guidance
☐ Appointment (select one)
☐ Guardian/Conservator
☐ Standby Guardian/Conservator
☐ Custodian/Successor Custodian (UTMA)
☐ Trust (select one)
☐ Impress/Declare/Create
☐ Reformation
☐ Will (select one)
☐ Construe
☐ Contested

MISCELLANEOUS

- ☐ Amend Death Certificate
☐ Appointment (select one)
☐ Church Trustee
☐ Conservator of Peace
☐ Marriage Celebrant
☐ Approval of Transfer of Structured Settlement
☐ Bond Forfeiture Appeal
☐ Declaratory Judgment
☐ Declare Death
☐ Driving Privileges (select one)
☐ Reinstatement pursuant to § 46.2-427
☐ Restoration -- Habitual Offender or 3rd Offense
☐ Expungement
☐ Firearms Rights -- Restoration
☐ Forfeiture of Property or Money
☐ Freedom of Information
☐ Injunction
☐ Interdiction
☐ Interrogatory
☐ Judgment Lien-Bill to Enforce
☐ Law Enforcement/Public Official Petition
☐ Name Change
☐ Referendum Elections
☐ Sever Order
☐ Taxes (select one)
☐ Correct Erroneous State/Local
☐ Delinquent
☐ Vehicle Confiscation
☐ Voting Rights -- Restoration
☐ Other (please specify)



☐ Damages in the amount of \$ 500,000.00 are claimed.

12/23/2020
DATEConnor Bleakley
PRINT NAME

3311 W Broad St. Richmond VA 23230

ADDRESS (TELEPHONE NUMBER OF SIGNATOR)

804-201-4969

cbleakley@hurtnva.com

EMAIL ADDRESS OF SIGNATOR (OPTIONAL)

FORM CC-1116 (MASTER) PAGE ONE 07/16

*"Contested" divorce means any of the following matters are in dispute: grounds of divorce, spousal support and maintenance, child custody and/or visitation, child support, property distribution or debt allocation. An "Uncontested" divorce is filed on no fault grounds and none of the above issues are in dispute.

**Civil Action Type Codes
(Clerk's Office Use Only)**

Accounting	ACCT	Ejectment	EJET
Adoption	ADOP	Encumber/Sell Real Estate	RE
Adoption -- Foreign	FORA	Enforce Vendor's Lien	VEND
Adult Protection	PROT	Escheatment	ESC
Aid and Guidance	AID	Establish Boundaries	ESTB
Amend Death Certificate	ADC	Expungement	XPUN
Annexation	ANEX	Forfeiture of Property or Money	FORF
Annulment	ANUL	Freedom of Information	FOI
Annulment -- Counterclaim/Responsive Pleading	ACRP	Garnishment	GARN
Appeal/Judicial Review		Injunction	INJ
ABC Board	ABC	Intentional Tort	ITOR
Board of Zoning	ZONE	Interdiction	INTD
Compensation Board	ACOM	Interpleader	INTP
DMV License Suspension	JR	Interrogatory	INTR
Employment Commission	EMP	Judgment Lien -- Bill to Enforce	LIEN
Employment Grievance Decision	GRV	Landlord/Tenant	LT
Local Government	GOVT	Law Enforcement/Public Official Petition	LEP
Marine Resources	MAR	Mechanics Lien	MECH
School Board	JR	Medical Malpractice	MED
Voter Registration	AVOT	Motor Vehicle Tort	MV
Other Administrative Appeal	AAPL	Name Change	NC
Appointment		Other General Tort Liability	GTOR
Conservator of Peace	COP	Partition	PART
Church Trustee	AOCT	Permit, Unconstitutional Grant/Denial by Locality	LUC
Custodian/Successor Custodian (UTMA)	UTMA	Petition -- (Miscellaneous)	PET
Guardian/Conservator	APPT	Product Liability	PROD
Marriage Celebrant	ROMC	Quiet Title	QT
Standby Guardian/Conservator	STND	Referendum Elections	ELEC
Approval of Transfer of Structured Settlement	SS	Reinstatement (Other than divorce or driving privileges)	REIN
Asbestos Litigation	AL	Removal of Case to Federal Court	REM
Attachment	ATT	Restore Firearms Rights -- Felony	RFRF
Bond Forfeiture Appeal	BFA	Restore Firearms Rights -- Review	RFRR
Child Abuse and Neglect -- Unfounded Complaint	CAN	Separate Maintenance	SEP
Civil Contempt	CCON	Separate Maintenance -- Counterclaim/Responsive Pleading	SCRP
Claim Impleading Third Party Defendant -- Monetary Damages/No Monetary Damages	CTP	Sever Order	SEVR
Complaint -- (Miscellaneous)	COM	Taxes	
Compromise Settlement	COMP	Correct Erroneous State/Local	CTAX
Condemnation	COND	Delinquent	DTAX
Confessed Judgment	CJ	Termination of Mineral Rights	MIN
Contract Action	CNTR	Trust -- Impress/Declare/Create	TRST
Contract Specific Performance	PERF	Trust -- Reformation	REFT
Counterclaim -- Monetary Damages/No Monetary Damages	CC	Uniform Foreign Country Money Judgments	RFCJ
Cross Claim	CROS	Unlawful Detainer	UD
Declaratory Judgment	DECL	Vehicle Confiscation	VEH
Declare Death	DDTH	Voting Rights -- Restoration	VOTE
Detinue	DET	Will Construction	CNST
Divorce		Will Contested	WILL
Complaint -- Contested/Uncontested	DIV	Writs	
Counterclaim/Responsive Pleading	DCRP	Certiorari	WC
Reinstatement -- Custody/Visitation/Support/ Equitable Distribution	CVS	Habeas Corpus	WHC
Driving Privileges		Mandamus	WM
Reinstatement pursuant to § 46.2-427	DRIV	Prohibition	WP
Restoration -- Habitual Offender or 3 rd Offense	REST	Quo Warranto	WQW
		Wrongful Death	WD



Commonwealth Law Group
3311 W. Broad Street
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Tel: 804.999.9999
Fax: 866.238.6415
hurtinva.com

December 23, 2020

Via Hand Delivery
Hon. Edward F. Jewett
Richmond City Circuit Court
400 North Ninth Street
Richmond, VA 23219

RE: Lekyna D. Taylor v. Paul A. Van Der Werken, et. al.
Case No.: Unknown

Dear Mr. Jewett:


Enclosed for filing, please find the following:

1. Original Complaint with one copy;
2. Civil Cover Sheet;
3. This firm's check in the amount of \$301.00; and

At this time, we are **not requesting service of the complaint**. When the matter is ready to be served, we will contact the court and arrange for pickup by a private process server.

Thank you for your time and consideration in this matter. If you have any questions, please do not hesitate to call me.

Very truly yours,


Connor Bleakley, Esq.

Enclosure

Dana C. Sullivan
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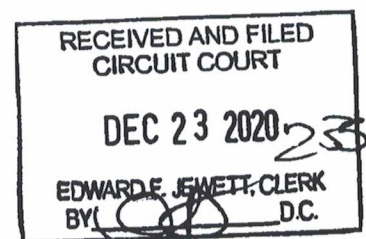
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Connor S. Bleakley
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Daniel Y. J. Park
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Dustin S. Carter
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VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

LEKYNA TAYLOR,

Plaintiff,

v.

**GREENWOOD MOTOR LINES, INC.,
et. al.**

Defendants.

Case No.: CL20006503

**ORDER OF NONSUIT AS TO JOHN DOE, R&L TRANSFER, LLC, AND R&L
TRANSFER, INC.**

THIS MATTER came before the Court his day upon the motion of the plaintiff, Lekyna Taylor, by counsel, for a voluntary nonsuit in this case pursuant to Virginia Code § 8.01-380 as to Defendants John Doe, R&L Transfer, LLC, and R&L Transfer, Inc, and it appearing to the Court that said motion for voluntary nonsuit should be granted, and further that no prior nonsuit has been filed and that no counter, cross claim, or third party action is pending in this action, it is hereby

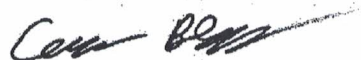
ORDERED that this cause be and hereby is dismissed as to John Doe, R&L Transfer, LLC, and R&L Transfer, Inc., without prejudice.

AND THIS MATTER is continued for further proceedings against Defendants Paul Alan Van Der Werken and Greenwood Motor Lines, Inc.

ENTERED this ____ day of December, 2021.

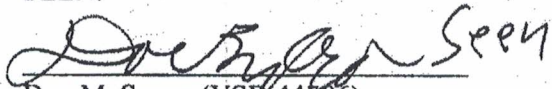
Judge

I ASK FOR THIS:



Connor Bleakley, Esq. (VSB #92113)
Commonwealth Law Group, LLC
3311 West Broad Street
Richmond, VA 23230
Phone: (804) 201-4969
Facsimile: (804) 201-4969
cbleakley@hurtinva.com
Counsel for Plaintiff

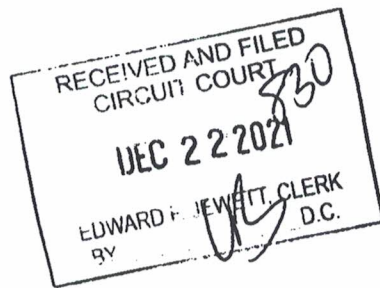
SEEN:



Dov M. Szego (VSB 44586)
Wilson Elser Moskowitz Edelman & Dicker LLP
8444 Westpark Drive - Suite 510
McLean, VA 22102-5102
703.245.9300 (Main)
703.245.9301 (Fax)
dov.szego@wilsonelser.com

and

David Hall
Wilson Elser Moskowitz Edelman & Dicker, LLP
1500 Urban Center Drive, Suite 450
Birmingham, AL 35242
Phone: (205) 709-8990
Facsimile: (205) 709-8979
David.Hall@wilsonelser.com
Counsel for Defendants Van Der Werken and Greenwood Motor Lines.



VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

LEKYNA TAYLOR,

Plaintiff,

v.

Case No.: CL20006503

**GREENWOOD MOTOR LINES, INC.
d/b/a R & L CARRIERS, INC.,**

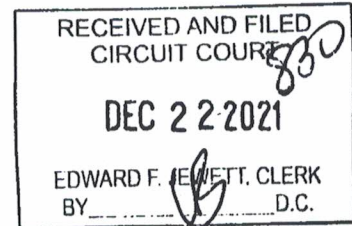
PAUL ALAN VAN DER WERKEN,

JOHN DOE, an unidentified driver,

R&L TRANSFER, LLC, and

R&L TRANSFER, INC.

Defendants.



**MOTION TO NONSUIT DEFENDANTS JOHN DOE R&L TRANSFER, LLC
AND R&L TRANSFER, INC.**

Plaintiff, Lekyna Taylor, by counsel, moves to nonsuit Defendants John Doe, R&L Transfer, LLC and R&L Transfer, Inc., and as grounds therefore, says as follows:

1. On December 23, 2020, Plaintiff filed a complaint against Greenwood Motor Lines, Inc., Paul Alan Van Der Werken, John Doe, R&L Transfer LLC, and R&L Transfer, Inc.
2. No defendant has filed a counterclaim, cross claim, or third party claim to said complaint.
3. Plaintiff has not previously taken a nonsuit in this Court or in any other Court on this cause of action.
4. Defendants Greenwood Motor Lines, Paul Alan Van Der Werken, and R&L Transfer, Inc., are represented by counsel, who does not object to this motion.

5. Defendants John Doe and R&L Transfer, LLC, are not represented by counsel and have not been served. Upon information and belief, R&L Transfer, LLC, does not exist.

6. Plaintiff does not move for a nonsuit against the remaining defendants, Paul Alan Van Der Werken and Greenwood Motor Lines, Inc.

WHEREFORE, Plaintiff Lekyna Taylor moves that this action against Defendants John Doe, R&L Transfer, LLC, and R&L Transfer, Inc., be dismissed without prejudice to the bringing of another action concerning any of the matters involved therein.

LEKYNA TAYLOR

By: 
Of Counsel

Connor Bleakley, Esq. (VSB #92113)
Commonwealth Law Group, LLC
3311 West Broad Street
Richmond, VA 23230
Phone: (804) 201-4969
Facsimile: (804) 201-4969
cbleakley@hurtingva.com
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2021, a true and correct copy of the foregoing motion was emailed to the following:

David Hall
Dov Szego
Wilson Elser Moskowitz Edelman & Dicker, LLP
1500 Urban Center Drive, Suite 450
Birmingham, AL 35242
Phone: (205) 709-8990
Facsimile: (205) 709-8979
David.Hall@wilsonelser.com
Dov.Szego@wilsonelser.com
Counsel for Defendants Van Der Werken, Greenwood Motor Lines, and R&L Transfer, Inc.



Commonwealth Law Group
3311 W. Broad Street
Richmond, VA 23230

Tel: 804.999.9999
Fax: 866.238.6415
hurтинva.com

December 21, 2021

Via Fax to 804-646-7274
Hon. Edward F. Jewett
Richmond City Circuit Court
400 North Ninth Street
Richmond, VA 23219

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Connor S. Bleakley
cbleakley@hurтинva.com

Daniel Y. J. Park
dpark@hurтинva.com


Dustin S. Carter
dcarter@hurтинva.com

**RE: Lekyna D. Taylor v. Paul A. Van Der Werken, et. al.
Case No.: CL20006503**

Dear Mr. Jewett:

Enclosed for filing, please find attached a motion for nonsuit and attached order signed by counsel. If you have any questions or concerns, please do not hesitate to contact me. Thank you for your assistance.

Very truly yours,


Connor Bleakley, Esq.

Enclosure

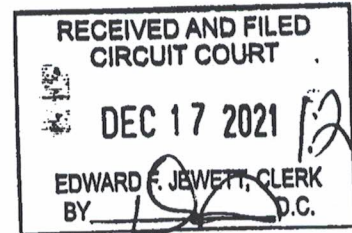


Commonwealth Law Group
3311 W. Broad Street
Richmond, VA 23230

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December 17, 2021

Via Hand Delivery
Hon. Edward F. Jewett
Richmond City Circuit Court
400 North Ninth Street
Richmond, VA 23219



Dana C. Sullivan
dsullivan@hurтинva.com

RE: Lekyna D. Taylor v. Paul A. Van Der Werken, et. al.
Case No.: CL20006503
URGENT

Seth R. Carroll
scarroll@hurтинva.com

Lauren B. Carroll
lcarroll@hurтинva.com

Dear Mr. Jewett:

Elyse H. Stiner
estiner@hurтинva.com

Please find enclosed two copies of the Complaint for service upon counsel of record for Defendants Paul Van Der Werken and Greenwood Motor Lines, Inc. Please prepare the complaint for service against the Defendants upon their counsel of record, David Hall:

Matthew W. Lastrapes
mlastrapes@hurтинva.com

David Hall
Wilson Elser Moskowitz Edelman & Dicker, LLP
1500 Urban Center Drive, Suite 450
Birmingham, AL 35242

Mark D. Dix
mdix@hurтинva.com

Jamie L. Karek
jkarek@hurтинva.com

Connor S. Bleakley
cbleakley@hurтинva.com

Once the complaint and summons are prepared for service, I will serve it directly on counsel for the defendants, who has previously agreed to accept service of the complaint by email. If you have any questions, please do not hesitate to contact me.

Daniel Y. J. Park
dpark@hurтинva.com

Dustin S. Carter
dcarter@hurтинva.com

Very truly yours,

Connor Bleakley
Connor Bleakley, Esq.

Enclosure



OFFICIAL RECEIPT
RICHMOND CITY CIRCUIT COURT
CIVIL

CASE # : 760CL2000650300

TIME : 14:54:20

RECEIPT # : 20000047181 TRANSACTION # : 20122300171

CASHIER : CLP REGISTER # : D869

CASE COMMENTS : TAYLOR, LEKYNA v. GREENWOOD MOTOR LINES IN

SUIT AMOUNT : \$500,000.00

ACCOUNT OF : TAYLOR, LEKYNA

PAID BY : COMMONWEALTH LAW GROUP, PLLC

CHECK : \$301.00 CHECK NUMBER : 13063

DESCRIPTION 1 : MV: MOTOR VEHICLE

2 : PLAINTIFF: TAYLOR, LEKYNA

3 : NO HEARING SCHEDULED

FILING TYPE : MV

PAYMENT : FULL PAYMENT

ACCOUNT CODE	DESCRIPTION	PAID
049	WRIT TAX (CIVIL)	\$25.00
106	TECHNOLOGY TRST FND	\$5.00
123	LEGAL AID SERVICES	\$9.00
147	INDIGENT ASSISTANCE (INA)	\$1.00
170	COURT TECHNOLOGY FUND	\$10.00

ACCOUNT CODE	DESCRIPTION	PAID
219	LAW LIBRARY	\$4.00
229	COURTHOUSE MAINTENANCE FEE (CHMF)	\$2.00
304	CIVIL FILING FEE (LAW & EQUITY)	\$240.00
426	PAPER SUBMISSION/COPY FEE	\$5.00

TENDERED : \$ 301.00

AMOUNT PAID : \$ 301.00

COMMONWEALTH OF VIRGINIA



RICHMOND CITY CIRCUIT COURT
Civil Division
400 NORTH 9TH STREET
RICHMOND VA 23219

RECEIVED AND FILED
CIRCUIT COURT

DEC 22 2021

EDWARD F. JEWETT, CLERK
BY _____ D.C.

Virginia:

Proof of Service

In the RICHMOND CITY CIRCUIT COURT

Case number: 760CL20006503-00

Service number: 001

Service filed: December 23, 2020

Judge:

Served by: ACCEPTANCE

Style of case: LEKYNA TAYLOR vs GREENWOOD MOTOR LINES INC

Service on: DAVID HALL

J. Wilson ELSEER MOSKOWITZ
EDELMAN & DICKER, LLP
1500 URBAN CENTER DRIVE,
SUITE 450
BIRMINGHAM AL 35242

Attorney: BLEAKLEY, CONNOR
3311 WEST BROAD STREET
RICHMOND VA 23230
804.999.9999

Instructions:

Returns shall be made hereon, showing service of Summons issued Friday, December 17, 2021 with a copy of the Complaint filed Wednesday, December 23, 2020 attached.

Hearing date :

Service issued: Friday, December 17, 2021

State of: Alabama

County/City of: Jefferson

To-Wit:

I, DAVID HALL, the defendant in the above styled Complaint now pending in the RICHMOND CITY CIRCUIT COURT do hereby accept Service Of Process, consisting of a copy of the Complaint attached thereto and notice on this the 17th day of December, 2021.

David R. Hall
(Defendant)
Attorney for Defendants

Subscribed and sworn to before me undersigned:

Vickie Bell
Notary signature (seal if out of state)

My commission expires: 10/13/2024

or

(Clerk/Deputy Clerk)

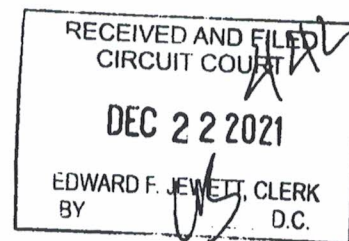


Commonwealth Law Group
3311 W. Broad Street
Richmond, VA 23230

Tel: 804.999.9999
Fax: 866.238.6415
hurtnva.com

December 22, 2021

Via Facsimile (804) 646-6562
Hon. Edward F. Jewett
400 North Ninth Street
John Marshall Courts Building
Richmond, VA 23219



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Dustin S. Carter
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RE: Lekyna D. Taylor v. Paul A. Van Der Werken, et. al.
Case No.: CL20006503-00

Dear Ms. Temple:

Enclosed for filing, please find an executed Proof of Service.

Thank you for your time and consideration in this matter. If you have any questions, please do not hesitate to call me.

Very truly yours,


Connor Bleakley, Esq.

Enclosure